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February 14, 2024

VIA EMAIL: tjb_orders@njd.uscourts.gov

Honorable Tonianne J. Bongiovanni, U.S.M.J
U.S. District Court, District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Doe v. Princeton University, et al.*
Case No. 3:19-cv-07853-RK-TJB

Dear Your Honor:

Please be advised, the undersigned represents Plaintiff John Doe in the above-referenced matter. The undersigned writes jointly with counsel for Defendants to provide a status update.

The mediation held with Judge Hochberg was unsuccessful and counsel for the parties will proceed to discovery in accordance with the following proposed discovery plan respectfully submitted pursuant to the Court's text order on January 16, 2024.

Initial disclosure pursuant to Rule 26(a)(1) must be completed by:	March 13, 2024
Initial requests for production of documents and for interrogatories must be served by:	May 16, 2024
Telephonic Conference	June 12, 2024 at 10 AM
Non-expert depositions must be completed by:	July 31, 2024
All fact discovery must be completed by:	August 30, 2024
Initial expert disclosures:	September 30, 2024
Rebuttal expert disclosures:	October 28, 2024
Close of expert discovery:	November 6, 2024
Deadline for dispositive motions	December 18, 2024
Deadline for oppositions to dispositive motions	February 12, 2024
Deadline for replies in support of dispositive motions	March 12, 2024

*proposed dates
to be addressed
prior to filing*
(JTB)

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So Ordered
February 15, 2024
[Signature]



Respectfully submitted,

NESENOFF & MILTENBERG, LLP

By: /s/ Helen Setton
Helen Setton, Esq.

cc: Counsel of Record